

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No:</b>	<b>20-11093</b>
<b>Ignacio Tejeda</b>	)		
<b>Cathy Ann Burnett</b>	)	<b>Chapter:</b>	<b>Chapter 13</b>
	)		
<b>Debtors</b>	)	<b>Judge:</b>	<b>Deborah L. Thorne</b>

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on **May 26, 2021 at 1:30 p.m.**, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present the motion of **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 160 9362 1728. The meeting ID and password can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Dale Riley

Dale Riley  
Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
312.332.1800  
ndil@geracilaw.com

**CERTIFICATE OF SERVICE**

I, Dale Riley, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on May 4, 2021 before 5:30 p.m.

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No:</b>	<b>20-11093</b>
<b>Ignacio Tejeda</b>	)		
<b>Cathy Ann Burnett</b>	)	<b>Chapter:</b>	<b>Chapter 13</b>
	)		
<b>Debtors</b>	)	<b>Judge:</b>	<b>Deborah L. Thorne</b>

**LIST OF PARTIES SERVED**

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL 60604

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Ignacio Manuel TejedaCathy Ann Burnett, 18506 Argyle Ave, Homewood, IL 60430

ALL OTHER CREDITORS ON THE ATTACHED SERVICE LIST

Ignacio Manuel Tejada  
Cathy Ann Burnett  
18506 Argyle Ave  
Homewood, IL 60430

Kohls/Capone  
Attn: Bankruptcy Dept.  
N56 Ridgewood Dr  
Menomonee Fal WI 53051

Village of Matteson  
Bankruptcy Department  
4900 Village Commons  
Matteson IL 60443

Bank of America  
Bankruptcy Department  
PO Box 15168  
Wilmington DE 19850

Macys/DSNB  
Attn: Bankruptcy Dept.  
Po Box 8218  
Mason OH 45040

Municipal Collection Serv. Inc  
Bankruptcy Dept.  
PO Box 327  
Palos Heights IL 60463

Barclays Bank Delaware  
Bankruptcy Department  
125 S. West St.  
Wilmington DE 19801

Progressive Insurance  
Bankruptcy Dept  
6300 Wilson Mills Rd  
Mayfield Village OH 44143

Municipal Collection Serv. Inc  
Bankruptcy Dept.  
PO Box 327  
Palos Heights IL 60463

Chase Bank  
Bankruptcy Department  
PO Box 15298  
Wilmington DE 19850

Caine & Weiner  
Bankruptcy Dept.  
PO Box 5010  
Woodland Hills CA 91365

Wells Fargo Home Mortgage  
Bankruptcy Dept  
8480 Stagecoach Cir  
Frederick MD 21701

Citibank  
C/O Cavalry Portfolio SERV  
Po Box 27288  
Tempe AZ 85285

Suntrust BANK  
Attn: Bankruptcy Dept.  
55 Park Pl Ne Ste 1055  
Atlanta GA 30303

WF CRD SVC  
Attn: Bankruptcy Dept.  
Po Box 14517  
Des Moines IA 50306

Citibank  
Bankruptcy Dept.  
701 E. 60th St., North  
Sioux Falls SD 57117

Syncb/Amazon  
Attn: Bankruptcy Dept.  
Po Box 965015  
Orlando FL 32896

City of Chicago  
Attn: City Clerk of Chicago  
121 N. LaSalle St  
Room 107  
Chicago IL 60602

Syncb/CARE CREDIT  
Attn: Bankruptcy Dept.  
950 Forrer Blvd  
Kettering OH 45420

Arnold Scott Harris PC  
Bankruptcy Dept.  
111 W Jackson Blvd Ste 600  
Chicago IL 60604

TD BANK USA/Targetcred  
Attn: Bankruptcy Dept.  
Po Box 673  
Minneapolis MN 55440

Comenitybank/Eddiebaur  
Attn: Bankruptcy Dept.  
Po Box 182789  
Columbus OH 43218

Clerk, Sixth Mun Div  
20M6001936  
16501 S. Kedzie  
Markham IL 60426

Comenitybk/WILLIAMS VS  
Attn: Bankruptcy Dept.  
Po Box 182120  
Columbus OH 43218

U.S. Small Business Administration  
Bankruptcy Department  
2 North 20th Street  
Birmingham AL 35203

FORD Motor Credit COMP  
Attn: Bankruptcy Dept.  
Po Box Box 542000  
Omaha NE 68154

US BANK  
Attn: Bankruptcy Dept.  
4325 17Th Ave S  
Fargo ND 58125

Illinois Housing Development Authority  
111 E. Wacker Dr. Ste. 1000  
Chicago IL 60601

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b> <b>Ignacio Tejeda</b> <b>Cathy Ann Burnett</b> <b>Debtors</b>	) ) ) ) )	<b>Case No: 20-11093</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Deborah L. Thorne</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COME the Debtors, Mr. & Mrs. Ignacio Tejeda (the “Debtors”), by and through their attorneys, Geraci Law L.L.C., to present their **MOTION TO MODIFY CONFIRMED PLAN**, and state as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtors filed their Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 05/18/2020.
3. The Debtors’ plan was confirmed by the Court on 08/12/2020.
4. During the plan, Mr. Tejeda’s self-employment income decreased due to the COVID-19 pandemic. Mr. Tejeda estimates he only makes \$175 from his self-employment per month.
5. The Debtors are on a fixed income and due to this decrease in Mr. Tejeda’s income, the Debtors wish to lower their plan payment to \$125 a month for the next 12 months. Please see Exhibit A for an updated budget.
6. For the reasons stated above, it is necessary for the successful completion of the Debtors’ plan to lower the Debtors’ plan payments to \$125 a month for the next 12 months.

7. The Debtors' plan will need to be extended to 66 months pursuant to 11 U.S. Code § 1329 (d).

WHEREFORE THE DEBTORS, Mr. & Mrs. Ignacio Tejada, respectfully request this Honorable Court enter an order:

1. Lowering the Debtor's plan payments to \$125 a month for the next 12 months.
2. Extending the Debtor's plan term to 66 months pursuant to 11 U.S. Code § 1329 (d).
3. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtors**

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960